



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

OCT 17 2013

Mary Ann Dolehanty
Permit Section Supervisor
Department of Environmental Quality
Air Quality Division
P.O. Box 30260
Lansing, Michigan 48909-7760

Dear Ms. Dolehanty:

Thank you for the opportunity to provide the Michigan Department of Environmental Quality (MDEQ) our comments on the draft construction permit for Renaissance Power LLC. (permit number 51-13). Below is our comment:

The draft permit proposes a Carbon Dioxide Equivalent (CO₂e) limit for the four combined cycle natural gas turbines of 1000 pounds per megawatt hour (lb/MW-hr) gross energy output for each unit. We have reviewed recent Best Available Control Technology determinations for similar natural gas fired combined cycle turbines and have found BACT limits which are lower than what is being proposed by MDEQ for the Renaissance Power project. MDEQ's recent Prevention of Significant Deterioration permit for the Wolverine Sumpter power plant included a 954 lb/MW-hr limit. Additionally, the State of Ohio has issued a permit with CO₂e BACT limit of 833 lbs/MW-hr for the Oregon Clean Energy Center. Please consider lowering the BACT limit for CO₂e in line with these recent permitting actions, or please explain why a lower CO₂e BACT is infeasible for this particular project..

We would like to thank you again for working with us in making sure that these issues were resolved in a timely manner. If you have any further questions, please feel free to contact Constantine Blathras, of my staff, at (312) 886-0671.

Sincerely,

Genevieve Damico
Chief
Air Permits Section